

Conformance to Outline

Cultural Resources

Affected Environment

- Section 1.0 is titled Executive Summary.
- Section 4.3 There is no "other information common to all regions". Therefore, Section 4.3 is discussio of Delta Region.
- No references section was provided

Environmental Consequences

- No TOC
- Otherwise follows outline

**REVIEW COMMENTS
CALFED BAY-DELTA PROGRAM PEIS TECHNICAL REPORTS
CULTURAL RESOURCES**

IMPACTS

No.	Page/Para	Comment
-	-	Affected Environment report was only partially reviewed. Comments on Impacts Report are based on review of 2 nd Edition of Impacts report. 3 rd edition received too late for review. However, many of the comments on 2 nd edition also apply to 3 rd edition and are included here.
1	General	In this report, there is a distinct lack of discussion of TCPs and potential impacts to TCPs, and the requirements for Native American consultation. This information should be included.
2	General	Try to differentiate between historic archaeological sites and historic architectural resources when discussing historic sites.
3	General	Definition of "low," "moderate," and "high" impacts would be helpful. An option is to use NEPA terminology to describe impacts (e.g., significant, less than significant, significant but mitigable, etc). NEPA terminology could also be used for description of alternatives and impacts (i.e., "With Alternative 1, significant impacts could potentially occur to cultural resources as a result of the construction of new water storage facilities. Prehistoric and historic archaeological resources could be affected by construction....Historic architectural resources could be affected by ..."). This type of phrasing would make it easier to pull portions of this technical report directly into the PEIS.
4	1, para 3	Define prehistoric, historic, and architectural resources, and TCPs, and give examples of each
5	-	Add summary of regulations (e.g., NHPA, ARPA, NAGPRA, AIRFA)
10	6, para 5	Discussion should not assume that a minor action will only have low impacts and major projects will have high impacts. It all depends on the type, nature, and extent of cultural resources present in the APE. Could it be rephrased to say major projects have a greater <u>potential</u> for significant impacts than a minor action due to the higher amount of ground disturbance, etc.?
12	6, para 5	Be sure to distinguish integrity of landscape from site integrity in text and table. Could a different word be used for "integrity" of landscape?
14	6, para 2	Discuss impacts to setting of NRHP-eligible structures as well as impacts from physical damage sustained during relocation.
16	7, last para	The CRHR is similar to NRHP but with some important differences. For example, a site can qualify for the CRHR by merely being 100 years old or older and possessing stratigraphic integrity. Age and integrity alone can not qualify a site for inclusion in the NRHP. Please describe these and other differences, or summarize App. K, Section III.
17	12, para 2	It may be helpful to also include the list of types of adverse effects to historic properties from 36 CFR § 800.9(b).
21	8, Impact summary table	It would be helpful to have impacts resulting from the No Action Alternative added to this table for easy comparison.

9/30/97

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3a	Executive Summary	Include summary table of impacts in Exec. Summary. Should briefly present the impacts and mitigations that are presented in the summary impacts table.
4	1, para 3	Define prehistoric, historic, and architectural resources, and TCPs, and give examples of each
5	-	Add summary of regulations (e.g., NHPA, ARPA, NAGPRA, AIRFA)
10	6, para 5	Discussion should not assume that a minor action will only have low impacts and major projects will have high impacts. It all depends on the type, nature, and extent of cultural resources present in the APE. Could it be rephrased to say major projects have a greater <u>potential</u> for significant impacts than a minor action due to the higher amount of ground disturbance, etc.?
12	6, para 5	Be sure to distinguish integrity of landscape from site integrity in text and table. Could a different word be used for "integrity" of landscape?
13	Significance Criteria	A summary statement is needed to make clear what significance criteria are applied to the impacts.
14	6, para 2	Discuss impacts to setting of NRHP-eligible structures as well as impacts from physical damage sustained during relocation.
16	7, last para	The CRHR is similar to NRHP but with some important differences. For example, a site can qualify for the CRHR by merely being 100 years old or older and possessing stratigraphic integrity. Age and integrity alone can not qualify a site for inclusion in the NRHP. Please describe these and other differences, or summarize App. K, Section III.
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	summary table	added to this table for easy comparison.
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